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2 UNITED STATES DISTRICT COURT
3 SOUTHERN DISTRICT OF NEW YORK

4 In Re Application of GORSOAN
5 LIMITED and GAZPROMBANK OJSC
6 for an Order Pursuant to 28
U.S.C. 1782 to Conduct
Discovery,

7 Petitioner,

8 v.

17 Civ. 5912
(RJS)

9 JANNA BULLOCK, RIGROUP LLC,
10 STUART ALAN SMITH, ZOE BULLOCK
REMMEL,

11 Respondents.

Deposition of
JANNA BULLOCK

12 -----x

13 New York, N.Y.
14 August 8, 2018
9:48 a.m.

15 Before:

16 HON. RICHARD J. SULLIVAN,

17 District Judge

18 APPEARANCES

19 FOLEY HOAG LLP
Attorneys for Petitioner
20 BY: CAROLINE S. DONOVAN, ESQ.

21 COOLEY LLP
Attorneys for Respondents
22 BY: JONATHAN P. BACH, ESQ.

23 SHER TREMONTE LLP
Attorneys for Respondents
24 BY: MICHAEL TREMONTE, ESQ.

25 ALSO PRESENT: IVAN URZHUMOV, ESQ., FOLEY HOAG LLP

SOUTHERN DISTRICT REPORTERS, P.C.
(212) 805-0300

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2 IT IS HEREBY STIPULATED AND AGREED, by
3 and between counsel for the respective parties
4 hereto, that the sealing and filing of the
5 within deposition be waived; that such
6 deposition may be signed and sworn to before any
7 officer authorized to administer an oath; that
8 all objections, except as to form, are reserved
9 to the time of trial.

10 - - - - -

11 THE COURT: Okay. Let's take
12 appearances. For the petitioner?

13 MS. DONOVAN: Your Honor, good
14 morning. My name is Caroline Donovan. I'm here
15 on behalf of petitioner Gorsoan Limited and
16 Gazprombank. This is my colleague Ivan
17 Urzhumov.

18 THE COURT: Could you spell the name
19 for me.

20 MS. DONOVAN: It's U-R-Z-H-U-M-O-V.
21 First name Ivan.

22 THE COURT: How do you pronounce that?

23 MR. URZHUMOV: Urzhumov.

24 THE COURT: Urzhumov. All right.
25 Good morning to you.

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2 And for the respondent?

3 MR. BACH: Good morning, your Honor,
4 Jonathan Bach on behalf of respondent Janna
5 Bullock.

6 MR. TREMONTE: Good morning, your
7 Honor. Michael Tremonte on behalf of respondent
8 Janna Bullock.

9 THE COURT: All right. Good morning
10 to each of you.

11 So Mr. Bach, this is your first time
12 in this matter, correct?

13 MR. BACH: That is correct, your
14 Honor.

15 THE COURT: When did you get into it?

16 MR. BACH: I got into it after a
17 conference before your Honor in which the --

18 THE COURT: I remember it. I remember
19 that conference.

20 MR. BACH: -- prospect of a potential
21 perjury application was raised.

22 THE COURT: Well, I think that there
23 was more to it. I think I made a finding of
24 contempt, right? I mean, that the false
25 statements had been made for sure.

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2 So in any event, we're here today to
3 just basically complete the deposition that was
4 previously started. It seems, I guess, to make
5 sense to have me here, because otherwise
6 everybody was either running to me in the middle
7 of it or stopping and then writing letters back
8 and forth and the thing was just taking forever,
9 and since it seemed to me that what was going on
10 in the prior deposition was very problematic, I
11 thought it made sense to be here. So I guess
12 that's why we're here.

13 And so tell me what you envision
14 happening, how long, and what subjects you plan
15 to cover, Ms. Donovan.

16 MS. DONOVAN: Thank you, your Honor.
17 We're prepared to complete the deposition that
18 was started on February 6, 2018. The subject
19 matters we wish to discuss will be concerning
20 Ms. Bullock's assets, or the likely assets of
21 Ms. Bullock; the transactions that are related
22 to some of the underlying fraud that's the
23 subject of the Cyprus proceeding. So we can
24 provide more information on the specific assets,
25 or we can do so during the course of the

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2 deposition. It's up to your Honor.

3 THE COURT: But you're going to be
4 using documents. It's going to be like a
5 deposition but it's going to feel more like a
6 trial, because it's in the courtroom on the
7 stand and not at a conference table.

8 MS. DONOVAN: That's correct.

9 THE COURT: And how long do you think
10 this will go?

11 MS. DONOVAN: It depends in part on
12 Ms. Bullock's answers. Last time took longer
13 than expected for the amount of material we were
14 able to cover. Four to five hours would be a
15 best guess if all of the questions are answered
16 completely.

17 THE COURT: Okay. All right. So
18 we've got a court reporter, we've got lawyers,
19 we've got the witness. So is there anything we
20 need to do before we start?

21 MS. DONOVAN: Not on our end, your
22 Honor.

23 THE COURT: Mr. Bach?

24 MR. BACH: Judge, just one question,
25 and that is whether Mr. Urzhumov is admitted to

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2 practice before any bar in the United States.

3 THE COURT: That's a fair question.

4 Go ahead.

5 MS. DONOVAN: So Mr. Urzhumov is not
6 admitted to practice in the US. He's a foreign
7 lawyer, but he's participating in the deposition
8 as a foreign lawyer at Foley and as one would be
9 able to do were this deposition being convened
10 outside the courtroom.

11 THE COURT: Okay. And so he's with
12 your firm?

13 MS. DONOVAN: That's correct. He's
14 with Foley's office in Paris.

15 THE COURT: And so he's involved in
16 the Cyprus action.

17 MS. DONOVAN: He's involved with the
18 other matters, the other proceedings related to
19 Ms. Bullock's testimony and the documents that
20 we've been collecting for the past couple of
21 years.

22 THE COURT: Okay.

23 MR. BACH: Judge, we have no objection
24 to Mr. Urzhumov being present during the
25 proceedings, but we would object to his

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2 participation since he's not admitted to
3 practice.

4 THE COURT: So he can't ask direct
5 questions, you mean.

6 MR. BACH: Correct.

7 THE COURT: So Ms. Donovan will ask
8 the questions but he can whisper in her ear.

9 MS. DONOVAN: We're agreed.

10 THE COURT: Okay.

11 MR. TREMONTE: Your Honor?

12 THE COURT: Yes.

13 MR. TREMONTE: May I approach on a
14 purely personal matter unrelated to the case,
15 just half a minute of the Court's time.

16 THE COURT: Sure. On the record?

17 MR. TREMONTE: No, no, your Honor.
18 Completely off the record. Just with your
19 Honor.

20 THE COURT: Are you guys comfortable
21 with this?

22 MS. DONOVAN: That's fine.

23 THE COURT: Okay.

24 (Discussion off the record)

25 THE COURT: Okay. We just had a brief

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discussion about a scheduling matter.

Okay. So should we bring up
Ms. Bullock? Ms. Bullock, why don't you come on
up.

Just remain standing and raise your
right hand.

(Witness sworn)

THE COURT: All right. Just answer
the questions put to you by the lawyers. And if
there's any dispute about what you should do,
then I'll resolve those disputes.

Okay. Go ahead, Ms. Donovan.

JANNA BULLOCK,

called as a witness by the Petitioner,
having been duly sworn, testified as follows:

EXAMINATION CONTINUED

BY MS. DONOVAN:

Q. Could you please state your name for
the record.

A. Janna Bullock.

Q. Could you please spell that name.

A. J-A-N-N-A, B-U-L-L-O-C-K.

Q. Have you ever been known by any other
name?

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A. It was the same name, same last name as I stated before; it was a different spelling.

Q. And what was that spelling?

A. B-U-L-A-K-H.

Q. Ms. Bullock, can you please state your address for the record.

A. 120 East 87th Street, New York, New York 10128.

Q. Ms. Bullock, do you recall we began your deposition in this matter on February 6, 2018?

A. On the advice of counsel, I invoke my constitutional right not to be a witness against myself and respectfully decline to answer your question.

Q. Ms. Bullock, at the deposition on February 6, 2018, do you recall that you were sworn in by a court reporter in the same way that you were just sworn in?

A. On the advice of counsel, I invoke my constitutional right not to be a witness against myself and respectfully decline to answer your question.

Q. And at that deposition, you agreed to

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provide truthful answers to my questions.

A. On the advice of counsel, I invoke my constitutional right not to be a witness against myself and respectfully decline to answer your question.

Q. And on February 6, 2018, you understood that the answers you gave were under the pains and penalties of perjury, is that correct?

A. On the advice of counsel, I invoke my constitutional right not to be a witness against myself and respectfully decline to answer your question.

Q. And you testified that nothing would interfere with your ability to give truthful testimony in this matter, is that correct?

A. On the advice of my counsel, I invoke my constitutional right not to be a witness against myself and respectfully decline to answer your question.

THE COURT: I mean, Mr. Bach, do you intend to allow this witness to answer any questions?

MR. BACH: Probably not.

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Q. Ms. Bullock, have you filed any affidavit with the Cyprus court?

A. On the advice of my counsel, I invoke my constitutional right not to be a witness against myself and respectfully decline to answer your question.

Q. Ms. Bullock, have you filed an affidavit with the Cyprus court disclosing all assets exceeding 10,000 euros?

A. On the advice of my counsel, I invoke my constitutional right not to be a witness against myself and respectfully decline to answer your question.

Q. And Ms. Bullock, you've not filed such an affidavit in this litigation, have you?

A. On the advice of my counsel, I invoke my constitutional right not to be a witness against myself and respectfully decline to answer your question.

Q. Ms. Bullock, you're familiar with the property at 210 Meadow Lane?

A. On the advice of my counsel, I invoke my constitutional right not to be a witness against myself and respectfully decline to

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answer your question.

Q. Ms. Bullock, you lived at the property at 210 Meadow Lane, is that correct?

A. On the advice of my counsel, I invoke my constitutional right not to be a witness against myself and respectfully decline to answer your question.

Q. Ms. Bullock, you paid taxes on the property at 210 Meadow Lane, correct?

A. On the advice of my counsel, I invoke my constitutional right not to be a witness against myself and respectfully decline to answer your question.

Q. Ms. Bullock, your children lived with you at times at the house at 210 Meadow Lane, is that correct?

A. On the advice of my counsel, I invoke my constitutional right not to be a witness against myself and respectfully decline to answer your question.

Q. And Ms. Bullock, you're aware that at your deposition on February 6, 2018, you testified that you were a housekeeper, effectively, for the house at 210 Meadow Lane?

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MR. BACH: Object to the form of the question.

A. On the advice of my counsel, I invoke my constitutional right not to be a witness against myself and respectfully decline to answer your question.

Q. Do you recall that you provided testimony about the property at 210 Meadow Lane at the deposition on February 6, 2018?

MR. BACH: Object to the form of the question.

A. On the advice of my counsel, I invoke my constitutional right not to be a witness against myself and respectfully decline to answer your question.

Q. Ms. Bullock, you have full use of the property at 210 Meadow Lane, is that correct?

A. On the advice of my counsel, I invoke my constitutional right not to be a witness against myself and respectfully decline to answer your question.

Q. And Ms. Bullock, you've hosted parties at the house at 210 Meadow Lane, correct?

A. On the advice of my counsel, I invoke

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my constitutional right not to be a witness
against myself and respectfully decline to
answer your question.

Q. Ms. Bullock, you're the beneficial
owner of the house at 210 Meadow Lane?

A. On the advice of my counsel, I invoke
my constitutional right not to be a witness
against myself and respectfully decline to
answer your question.

Q. Ms. Bullock, are you familiar with the
Landmark Trust?

A. On the advice of my counsel, I invoke
my constitutional right not to be a witness
against myself and respectfully decline to
answer your question.

Q. And you're familiar with a lawyer
named Madeleine Fabre, is that correct?

A. On the advice of my counsel, I invoke
my constitutional right not to be a witness
against myself and respectfully decline to
answer your question.

Q. And Ms. Bullock, you're aware that
Ms. Fabre was the trustee of the Landmark Trust?

A. On the advice of my counsel, I invoke

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my constitutional right not to be a witness
against myself and respectfully decline to
answer your question.

Q. And Hotel Pralong and Hotel Crystal
are located in Courchevel in France, correct?

A. On the advice of my counsel, I invoke
my constitutional right not to be a witness
against myself and respectfully decline to
answer your question.

MS. DONOVAN: Could you please mark
this as Exhibit 33.

(Exhibit 33 marked for identification)

Q. Please take a moment and review
Exhibit 33.

Ms. Bullock, do you recognize
Exhibit 33?

A. On the advice of my counsel, I invoke
my constitutional right not to be a witness
against myself and respectfully decline to
answer your question.

Q. Now, Ms. Bullock, Exhibit 33 is your
verified complaint against Giancarlo Alhadeff,
correct?

A. On the advice of my counsel, I invoke

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my constitutional right not to be a witness
against myself and respectfully decline to
answer your question.

Q. And this is a lawsuit you filed
against Giancarlo Alhadeff in 2012 in state
court, New York?

A. On the advice of my counsel, I invoke
my constitutional right not to be a witness
against myself and respectfully decline to
answer your question.

Q. And if you turn to the page, the last
page, which is No. 10, that's your signature
under the verification, correct?

A. On the advice of my counsel, I invoke
my constitutional right not to be a witness
against myself and respectfully decline to
answer your question.

Q. And you understood that in verifying
this complaint, you were swearing to the truth
of its statements, correct?

A. On the advice of my counsel, I invoke
my constitutional right not to be a witness
against myself and respectfully decline to
answer your question.

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Q. And that one of those statements was that you, the plaintiff, have been the beneficial owner and sole shareholder of a number of hotel operating companies throughout the world, including hotels in France and Russia, is that correct?

A. On the advice of my counsel, I invoke my constitutional right not to be a witness against myself and respectfully decline to answer your question.

Q. You have been the beneficial owner and sole shareholder of a number of hotel operating companies, correct?

A. On the advice of my counsel, I invoke my constitutional right not to be a witness against myself and respectfully decline to answer your question.

Q. And one of those hotel operating companies is Societe des Hotels D'Altitude, is that correct?

A. On the advice of my counsel, I invoke my constitutional right not to be a witness against myself and respectfully decline to answer your question.

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Q. And the Societe des Hotels D'Altitude owns the Hotel Pralong and the Hotel Crystal, correct?

A. On the advice of my counsel, I invoke my constitutional right not to be a witness against myself and respectfully decline to answer your question.

MS. DONOVAN: Could you please mark this as Exhibit 34.

(Exhibit 34 marked for identification)

Q. Please take a moment and review Exhibit 34.

Ms. Bullock, are you familiar with Exhibit 34?

A. On the advice of my counsel, I invoke my constitutional right not to be a witness against myself and respectfully decline to answer your question.

Q. And Ms. Bullock, Exhibit 34 is a sale and purchase agreement between Societe des Hotels D'Altitude, Solferino Development, and RIGroup LLC, correct?

A. On the advice of my counsel, I invoke my constitutional right not to be a witness